

CALFRESH (CF) PROGRAM REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 6/22/16	NEED RESPONSE BY: 7/3/16
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Contra Costa County	
3. PHONE NO.:	7. SUBJECT: LYFT Income	
4. REGULATION CITE(S): 63-503.4	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). MPP 63-503.413, ACL 12-25, ACIN I-45-11	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

Are drivers like UBER and LYFT treated the same way. We have a client who is a LYFT driver receives the income deposited directly into her account. However the amount being deposited into her account and the income verification she provides differs. In this instance are we still to use the amount deposited directly into her account instead of the amount verified on the income summary verification she provided.

In a previous PI on UBER income it was stated that the self employment income used to determine the budget is the amount received in the client's bank account. So in this instance since the amount differs from the verification should we just use the amount shown in the deposit with the bank and disregard the verification provided.

10. REQUESTOR'S PROPOSED ANSWER:

Use the amount deposited in to the bank account since that is the amount paid to the client and considered as their gross self-employment income and then deduct self-employment expenses of 40% or actual based on client's preference.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

Rideshare driver income is treated as self-employment income. As such, UBER and LYFT drivers should be treated in same way-as earners of self-employment income. According to ACIN 1-45-11, page 4, the CWD shall determine an amount to be used for the purpose of eligibility determination based on the best available information. Which is the bank statement in this case. The additional verification provided by the client, a pay stub which shows a different amount of earned income should be considered a qualified document only for the purpose of providing proof of earned income. If the rideshare driver expects a change or has fluctuating income, CWDs should follow guidelines for treating fluctuating income on Page 30 of ACL 12-25.

FOR CDSS USE

DATE RECEIVED: 6/22/16	DATE RESPONDED TO COUNTY/ALJ: SV 08-09-2016
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